

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

**Coating Place, Inc.
200 Paoli Street
Verona, Wisconsin 53593**

ATTENTION:

**Armando Vera
EHS Coordinator**

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Coating Place, Inc. (CPI, or you) to submit certain information about the facility at 200 Paoli Street, Verona, Wisconsin.

Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within thirty (30) calendar days after you receive this request.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

CPI owns or operates emission sources at the Verona, Wisconsin facility. We are requesting this information to determine whether your emission sources are complying with the CAA.

CPI must send all required information to:

Attn: Compliance Tracker, AE-18J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

CPI must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term “emissions data.”

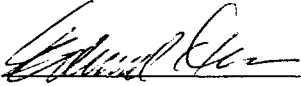
This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject CPI to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Albana Bega at (312) 353-4789 or Alexandra Letuchy at (312) 886-6035.

12/6/17
Date



Edward Nam
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*

1. The terms “document” and “documents” shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
2. The term “relate to” (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.

Appendix B

Information You Are Required to Submit to EPA

Coating Place, Inc. (CPI) must submit the following information for its facility located at 200 Paoli Street, Verona, Wisconsin (the facility), pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a):

1. Provide copies of permit application(s) submitted to the Wisconsin Department of Natural Resources (WDNR) within the last five (5) years, including the permit application(s) submitted for the current Title V Permit No. 113020380-P30, issued on May 1, 2015 (Title V Permit).
2. Provide copies of any deviation reports, excess emissions reports, or startup, shutdown, and malfunction reports submitted to the WDNR from November 1, 2012, to the present. Additional copies need not be sent for the Air Operation Permit Deviation Summary Report, dated January 18, 2016, provided to EPA during the inspection in June 2016.
3. Provide copies of all quarterly reports, semi-annual compliance reports, or equivalent documents submitted to WDNR from October 1, 2012, to the present. Additional copies need not be sent for the 2015 Subpart GGG semi-annual report, dated January 18, 2016, provided to EPA during the inspection in June 2016.
4. Provide a list and copies of each emissions test conducted for any reason, from January 1, 2010 to the present, for each emission source at the facility. Emission testing includes, but is not limited to, compliance testing, engineering testing, and testing for general information. Use the following guideline for compiling the list and preparing copies of the stack tests:
 - a. **List:** Identify the emissions unit, the control device, the date of the test, the federal or state regulation requiring the test (if applicable), pollutants tested, load level during the test, and the test method(s) used. For each test during which the source was not operating at maximum design capacity, provide an explanation for why production was limited. Indicate whether the report was shared with the WDNR.
 - b. **Copies:** Provide full stack test reports, including the summary pages, the section describing the process parameters and production or processing rates at the time of the test, all test runs, and all calculations. Additional copies need not be sent for test reports provided to EPA by electronic mail in June 2017.
5. Provide a list of solvents used at the facility that contain any amount of volatile organic compound (VOC) or hazardous air pollutant (HAP), for the period from October 1, 2012, to the present. For each solvent, provide the following:

- a. The amount of the VOC and/or HAP present (i.e., percent by weight);
 - b. Process(es) and unit(s) where solvent is used at; and
 - c. Annual usage in pounds per year.
6. Provide a copy of the letter dated March 23, 2012 submitted to WDNR, that includes the "in-depth discussion of the applicability of the Pharma MACT to CPI", as stated in the Notification of Compliance Status (NOCS) report letter submitted to WDNR, dated January 28, 2013.
7. State whether the facility has made any process changes, such as the starting of a new process, since the submission of the NOCS.
8. State whether the facility has identified any point of determination (POD) of wastewater as defined at 40 C.F.R. § 63.1251, pursuant to 40 C.F.R. § 63.1256. For each POD, provide the following:
 - a. POD identification;
 - b. Annual average concentration of each partially soluble and/or soluble HAP compounds listed in Table 2 and Table 3 of 40 C.F.R. Part 63, Subpart GGG;
 - c. Flow rates; and
 - d. A diagram indicating the flow of stream(s) with each opening to the atmosphere.
9. Provide copies of facility's maintenance procedures (such as standard operating procedures) for management of wastewater generated from the emptying and purging of equipment in the process during temporary shutdowns for inspections, maintenance, and repair, and during periods which are not shutdowns (i.e., routine maintenance), for the period from October 1, 2012, to the present, as required by 40 C.F.R. § 63.1256(a)(4)(i).
10. Provide a list of each piece of equipment at the facility that is subject to equipment leak requirements, pursuant to 40 C.F.R. § 63.1255, for the period from October 1, 2012, to the present. For each piece of equipment, indicate its unique identification number, if available, and its corresponding process unit. Include a description of how the equipment is identified so that it can be distinguished readily from equipment that is not subject to 40 C.F.R. § 63.1255, and provide supporting documentation such as a plant site plan or log entries as required in 40 C.F.R. § 63.1255(a)(7).
11. Provide records of the leak tests conducted at the facility for the period from October 1, 2012, to the present, in order to demonstrate compliance with the requirements of the 40 C.F.R. §§ 63.178(b) and 63.180(g). For each failed leak test, provide all records related to repair attempts, successful repair, and delay of repair.

12. Prove a process instrumentation diagram (P&ID) of 353C Model 4600 K2 Suite (Unit), On the P&ID, identify each piece of equipment listed in response to Request No. 10 above.
13. Provide a copy of the current and all past iterations of the facility's startup, shutdown, and malfunction plan, required by 40 C.F.R. § 63.1259(a)(3).
14. Provide a copy of facility's description of worst-case operating conditions under which initial compliance was demonstrated for control devices used to control batch processes, required by 40 C.F.R. § 63.1259(b)(9).
15. Provide records required by the Title V Permit Condition H.2.c.(2).
16. Provide records required by the Title V Permit Condition X.1.c.(1) and 40 C.F.R. § 63.1259(i)(6)(i), for the period from October 1, 2012, to the present.
17. Provide a detailed description of where process waste solvent is generated, a detailed description of how the facility handles process waste solvent, and records of process waste solvent generated at the facility within the last three (3) years. If process waste solvent is collected to a sump basin(s), provide a P&ID of the sump basin(s), and photos of the sump basin(s).
18. Provide copies of the Initial Notification and Notification of Compliance Status submitted pursuant to 40 C.F.R. Part 63, Subpart DDDDD (National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters) for all of the facility's boilers. State the date each Initial Notification and Notification of Compliance Status was prepared and/or submitted, and identify the agency or agencies to which each certification was submitted.

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the information request as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information Is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show: that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential by page, paragraph and sentence. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

I certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by

Certified Mail, Return Receipt Requested, to:

Armando Vera
EHS Coordinator
200 Paoli Street
Verona, Wisconsin 53593

I also certify that I sent a copy of the Request to Provide Information Pursuant to the

Clean Air Act by E-mail to:

Maria Hill
Chief, Compliance Enforcement and Emission Inventory Section
Maria.Hill@wisconsin.gov

On the 8th day of December 2017.



Kathy Jones, Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER:

7001 0320 0006 0185 6616